

### **REMARKS**

In response to the action of April 8, 2009, applicants ask that all claims be allowed in view of the amendments to the claims and the following remarks. Claims 36-51, 53, 57, 59, and 60 are currently pending, of which claims 36, 57, and 59 are independent. Claims 36, 57, and 59 have been amended.

### **Interview Summary**

Initially, applicants' undersigned representative thanks Examiner Borissov for the thoughtful courtesies and kind treatment afforded during the interview conducted on June 30, 2009. During the interview, Examiner Borissov and applicants' representatives discussed proposed amendments to the independent claims. This reply reflects the substance of the interview.

### **§ 101 Rejections**

Claims 59 and 60 have been rejected as being directed to non-statutory subject matter. Applicants have amended claim 59 and submit that the amendments address all of the issues raised in the Office Action. Therefore, applicants respectfully request reconsideration and withdrawal of this rejection.

### **§ 103 Rejections**

Claims 36-46, 53, 57, 59, and 60 have been rejected over O'Brien (Computers in Business Management) in view of Gharavy (U.S. Patent Application Pub. No. 2003/0004840) and claims 47-51 have been rejected over O'Brien in view of Gharavy and Al Senia (The Internet Forefront). Based on the following remarks, withdrawal of the § 103 rejections and further examination are respectfully requested.

Referring to particular claim language, independent claim 36 recites a method comprising, inter alia, tracking, by a computer system, information related to business transactions between an organization and a customer to identify a schedule of recurring transactions that occur in a lifecycle of business between the organization and the customer and

determining, by the computer system, a next expected transaction between the organization and the customer and a second time period for completion of the next expected transaction based on the tracked schedule of recurring transactions that occur in the lifecycle of business between the organization and the customer and jurisdictional rules that define required time periods for completion of transactions that differ between jurisdictions.

The applied references are not seen to disclose, teach or suggest the foregoing features recited by amended independent claim 36. In particular, as discussed in the interview of June 30, 2009, O'Brien describes a bill payment system that monitors for payments and sends a reminder when a payment has not been received and is overdue. See O'Brien at pages 297-298. Although the O'Brien bill payment system monitors for payments, the O'Brien bill payment system does not track information related to business transactions between an organization and a customer to identify a schedule of recurring transactions that occur in a lifecycle of business between the organization and the customer and determine a next expected transaction between the organization and the customer and a second time period for completion of the next expected transaction based on the tracked schedule of recurring transactions and jurisdictional rules that define required time periods for completion of transactions that differ between jurisdictions. Rather, the O'Brien bill payment system merely sends a reminder when a payment becomes overdue without regard for a next expected transaction.

Gharavy, which is directed to determining whether a representative has met licensing requirements of a third party licensing authority, fails to remedy the deficiencies of O'Brien discussed above. Al Senia, which was cited for describing how a utility company switches to e-commerce and interacts with customers over the Internet, also fails to remedy the deficiencies of O'Brien discussed above.

Thus, for at least these reasons, applicants submit that the applied references fail to describe or suggest tracking, by a computer system, information related to business transactions between an organization and a customer to identify a schedule of recurring transactions that occur in a lifecycle of business between the organization and the customer and determining, by the computer system, a next expected transaction between the organization and the customer and a second time period for completion of the next expected transaction based on the tracked schedule of recurring transactions that occur in the lifecycle of business between the organization

and the customer and jurisdictional rules that define required time periods for completion of transactions that differ between jurisdictions, as recited in amended independent claim 36. Accordingly, applicants respectfully request reconsideration and withdrawal of the rejection of amended independent claim 36.

Independent claim 57, although different in scope from claim 36, recites features similar to those discussed above with respect to independent claim 36. Accordingly, applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 57 for reasons similar to those discussed above with respect to claim 36.

Independent claim 59 recites a computer-implemented method comprising, inter alia, tracking, by a transaction computer system, information related to business transactions between an organization and clients to identify a schedule of recurring transactions that occur in a lifecycle of business between the organization each of the clients and determining, by the transaction computer system, a next expected transaction between the organization and a client and a second time period for completion of the next expected transaction based on the tracked schedule of recurring transactions that occur in the lifecycle of business between the organization and the client and jurisdictional rules that define required time periods for completion of transactions that differ between jurisdictions.

Applicants submit that the applied references fail to describe or suggest at least these features for reasons similar to those discussed above with respect to claim 36. Therefore, applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 59.

The other rejected claims in the application are each dependent on these independent claims and are thus believed to be allowable over the applied references for at least the same reasons. Because each claim is deemed to define additional aspects of the disclosure, however, the individual consideration of each claim on its own merits is respectfully requested.

### Conclusion

All of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be

Applicant : Stuart J. Solomon et al.  
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Filed : December 20, 2001  
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108/01316-00/US

exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants submit that all claims are in condition for allowance. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: July 8, 2009

/Jeremy J. Monaldo/

Jeremy J. Monaldo  
Reg. No. 58,680

**Customer No. 26212**

Fish & Richardson P.C.

Telephone: (202) 783-5070

Facsimile: (877) 769-7945